LAW OFFICES OF PRIYA CHAUDHRY

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MATAMO ENDORSED

Via Facsimile 212.805.6326

Honorable Coleen McMahon United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 October 28, 2011

Tkadir Warsame, 11 CR 559 (CM)

Re: United States v. Ahmed Abdulkadir Warsame, 11 CR 559 (CM)

Dear Judge McMahon:

As Your Honor is aware, along with co-counsel Lee Ginsberg, Esq., I represent Ahmed Abdulkadir Warsame in the above-referenced case. Currently, this matter is scheduled for a status conference before Your Honor on November 2, 2011. The purpose of this letter is to respectfully request that the Court adjourn Mr. Warsame's upcoming status conference for at least six weeks.

The reason for this request is that defense counsel and Mr. Warsame have not completed a review of the discovery here. As to defense counsel, Mr. Ginsberg only received his security clearance this week and thus has not been able to review the classified discovery thus far. As to Mr. Warsame, the government has been attempting to make certain electronic discovery available to him at the MCC, but due to the restrictions placed by the MCC on electronic discovery, the government has not yet been able to provide Mr. Warsame with this discovery.

Both parties believe that a six-week adjournment will afford both Mr. Ginsberg and Mr. Warsame an adequate opportunity to review the voluminous discovery here. Therefore, Mr. Warsame consents to the exclusion of time and the government joins this request.

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Honorable Coleen McMahon October 28, 2011 Page 2

I thank Your Honor for your attention to this request.

Very truly yours, Priya Chaudhry

AUSA Ben Naftalis (via email only) Cc: AUSA Adam Hickey (via email only)